

**U.S. District Court
Southern District of Ohio
Western Division**

UNITED STATES OF AMERICA	:	Case No. 1:18-cr-00109-TSB-8
	:	<i>(Judge Black)</i>
Plaintiff,	:	
	:	
-vs-	:	
	:	
ROMAN IAKOVLEV	:	<u>DEFENDANT, ROMAN IAKOVLEV'S,</u>
	:	<u>ADDENDUM TO MOTION FOR BOND</u>
Defendant.	:	

Now comes Defendant, Roman Iakovlev, by and through counsel, and respectfully moves this honorable Court to release him on bond with any conditions that the Court deems appropriate. Defendant previously filed a motion for bond, citing the fact that he was not a danger to the community and that his appearance at all court proceedings would occur. Since that time, Defendant has received voluminous discovery, over 1,000,000 documents, which require the attorney and Mr. Iakovlev to go through. Unfortunately, it is extremely difficult to go through all of the discovery by visiting Mr. Iakovlev at the Butler County Jail. It is believed that numerous hours need to be set aside, preferably in a conference room at counsel's office, to go through discovery in order to properly prepare a defense for this case. Therefore, it is respectfully requested that this Court grant the bond as previously requested imposing whatever restrictions this Court deems appropriate.

Respectfully submitted,

s/Edward J. McTigue

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CERTIFICATE OF SERVICE

I hereby certify that I electronically filed on the 15th day of November 2018, the foregoing with the Clerk of the Court using the CM/ECF system which will send notification of such filing to the Assistant U.S. Attorney, 221 E. Fourth Street, Suite 400, Cincinnati, Ohio 45202 and is being served upon Roman Iakovlev via ordinary U.S. Mail at the Butler County Jail, 705 Hanover Street, Hamilton, Ohio 45011.

s/Edward J. McTigue

Edward J. McTigue (0002077)